



## COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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Chief Engineer and General Manager

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The Honorable Mary Nichols, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814

Dear Chairman Nichols:

### **Draft Aliso Canyon Methane Leak Climate Impacts Mitigation Program**

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate this opportunity to comment on the proposed Aliso Canyon Climate Impacts Mitigation Program (draft mitigation program). The Sanitation Districts provide environmentally sound, cost-effective wastewater and solid waste management for over 5.5 million people in Los Angeles County and, in the process, convert waste into resources such as recycled water, energy, and recycled materials. The Sanitation Districts' service area covers approximately 800 square miles and encompasses 78 cities and unincorporated areas within Los Angeles County through a partnership agreement with 24 independent special districts.

The draft mitigation program document requires Southern California Gas Company to undertake projects to fully mitigate methane that leaked as a result of the Aliso Canyon incident, while using those same projects to "jump start" on-going methane reduction in support of the Short-Lived Climate Pollutant Program goals. We fully support CARB's recommendation that the draft mitigation program focus on methane reduction, especially from the landfill and wastewater sectors. The draft Short-Lived Climate Pollutant Reduction Strategy details how the wastewater industry can play a vital role in managing organic waste that is diverted from landfills, and in fact, wastewater treatment facilities are well-positioned to proceed quickly in accepting processed food waste for co-digestion in existing wastewater anaerobic digesters where excess capacity is available. On a statewide basis, the California Association of Sanitation Agencies has estimated that wastewater agencies may have digester capacity available to accept up to 75% of the food waste currently being disposed at landfills in California. Because these wastewater digesters are already sited, built and operational, and there is a streamlined permit pathway for taking processed organic waste to wastewater facilities (which is embodied in CalRecycle's compostable materials regulations that took effect January 1, 2016), the wastewater sector presents a real opportunity for early and rapid action to divert substantial quantities of organic waste from landfills and reduce methane emissions in the near term (3-5 years).



To demonstrate the viability of co-digesting diverted food waste with wastewater solids, the Sanitation Districts undertook a demonstration program at its Joint Water Pollution Control Plant in Carson, which began in 2014, utilizing food waste processed by a large private waste company. The effectiveness of managing this organic waste stream in this manner has been demonstrated to be technically viable at this facility. The next step the Sanitation Districts would like to take is to increase the tonnage that is managed beyond the demonstration scale to full commercial operation. The next phase of this program will need to include a project component to sustainably manage the biogas, possibly through pipeline injection. While this component of the project may potentially longer to come online, it should be feasible to complete it within the 5-10 year timeframe expected for implementation of projects under the final mitigation program, especially if Southern California Gas Company provides streamlining for pipeline interconnection as part of the mitigation program. We urge CARB to include a streamlining component for pipeline interconnection projects in the final mitigation program.

In anticipation of CARB releasing an RFP for implementation of the final mitigation program, the Sanitation Districts have begun to assemble a project proposal that will provide methane reduction through the diversion of organics from landfilling, which will have co-benefits in many communities in Los Angeles County, including many that are disadvantaged communities. The project, which will be managed and operated by the Sanitation Districts (potentially utilizing public/private partners), is envisioned to involve all steps in organics management, from processing raw food waste, to co-digestion with wastewater solids, and both solids and biogas management designed to maximize resource and energy recovery. Because the project would take advantage of both the existing infrastructure of a wastewater treatment plant and existing solid waste handling facilities, many portions of the project will be able to be implemented in a cost-effective and timely manner. However, some aspects, such as developing bioenergy utilization project elements, may take additional time to fully develop. Based on the multiple benefits this type of project can provide, we hope that CARB will prioritize projects that will divert organic waste to wastewater anaerobic digestion facilities for funding through the final mitigation program.

In reviewing the draft mitigation program, the Sanitation Districts have some minor comments:

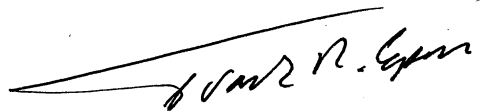
*Section III – Quantifying Full Mitigation* – CARB suggests using a methane global warming potential (GWP) based upon 20-years. While CARB can certainly utilize this approach when providing emission updates for the Short-Lived Climate Pollutant Program, for determining progress towards “full mitigation,” we recommend simply keeping the recordkeeping by tracking the amount of methane reduced. This avoids having to do conversions, or re-doing conversions if the GWP is updated, which occurs periodically. Also, since methane reduction from projects such as organic diversion from landfills to anaerobic digesters will require a calculation of the avoided landfill methane emissions, it would be helpful for CARB to provide details on the protocols that

should be used for this calculation, so meaningful comparisons can be made for all similar projects.

- *Section VI – Going Forward: Project Selection and Program Development* – In soliciting projects, we recommend that sufficient time be allowed for proposal submittal, recognizing that, in addition to developing the project proposal, public entities have to go through their governing boards for approval. Typically, 2-3 months is necessary for this process. Section VI also details procedures that should be followed for project submittal and initial evaluation, but falls short of actually detailing what criteria will be used for the project selection process (e.g., cost effectiveness, methane reduced, timeliness, etc.). We would appreciate it if further details on the project selection process are included in the final mitigation plan. Finally, one of the listed required project details is “*An explanation of how emission reductions associated with the project are to be assigned or allocated to SoCalGas*”. We would appreciate further details, as it is not clear what is meant by this item. One interpretation is this is simply the mechanism by which methane reductions are calculated and reported to SoCalGas. Another interpretation is the transfer of potential reduction credits that are fungible. Once again, clarification of this requirement would be appreciated.

We appreciate the opportunity to comment on the draft mitigation program. Please contact the undersigned at this office for any question or comments.

Very truly yours,



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Technical Services Department

FRC:bb

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